

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

**JESSICA JONES, et al.,**

Plaintiffs,

v.

**VARSITY BRANDS, LLC, et al.**

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**JURY DEMAND**

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**PLAINTIFFS' MOTION TO COMPEL RESPONSES TO INTERROGATORIES BY  
DEFENDANT JEFF WEBB**

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Plaintiffs Jessica Jones and Christina Lorenzen (collectively, "Plaintiffs"), individually and on behalf of all others similarly situated, move this Court, pursuant to Fed. R. Civ. P. 37 and Local Rule 26.1(b), for an order compelling Defendant Jeff Webb to respond fully to Plaintiffs' First Set of Interrogatories. Jeff Webb has objected and refused to comply with the following discovery requests, the responses to which are set forth verbatim, in accordance with Local Rule 26.1(b)(2):

**Interrogatory No. 1:**

State each affirmative defense to the claims against You.

**Answer:**

Mr. Webb objects to Interrogatory No. 1 as overly broad in that it imposes a burden on Mr. Webb in excess of the requirements of the Federal Rules of Civil Procedure. Pursuant to Federal Rule of Civil Procedure 8, Mr. Webb is obligated to state his affirmative defenses in responding to Plaintiffs' pleading. Mr. Webb's deadline to file an answer in

response to Plaintiffs' Complaint Class Action has not yet occurred. Subject to and without waiving the foregoing objections, Mr. Webb will state his affirmative defenses, if any, when required to file an answer in accordance with the Federal Rules.

**Interrogatory No. 2:**

State each fact which supports each affirmative defense stated in response to Interrogatory No. 1.

**Answer:**

Mr. Webb objects to Interrogatory No. 2 as premature and overly broad in that it imposes a burden on Mr. Webb in excess of the requirements of the Federal Rules of Civil Procedure. Pursuant to Federal Rule of Civil Procedure 8, Mr. Webb is obligated to state his affirmative defenses in responding to Plaintiffs' pleading. Mr. Webb's deadline to file an answer in response to Plaintiffs' Complaint Class Action has not yet occurred. Mr. Webb will state his affirmative defenses, if any, in his responsive pleading in accordance to his deadline to do so under the Federal Rules.

Mr. Webb also objects to Interrogatory No. 2 as premature because discovery is ongoing and the Interrogatory requires Mr. Webb to "state each fact" supporting each affirmative defense. Mr. Webb objects further to this Interrogatory on the grounds that it contains multiple subparts, with each affirmative defense that Mr. Webb will assert constituting a separate subpart. Combined with the Plaintiffs' Second Set of Interrogatories, Plaintiffs have exceeded their limit of twenty-five interrogatories under Federal Rule of Civil Procedure 33. Subject to and without waiving the foregoing objections, Mr. Webb will state facts supporting his affirmative defenses at the time and to the extent required by the Federal Rules.

Dated: April 14, 2022

Respectfully submitted,

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 14, 2022, I served a copy of the foregoing document via the Court's ECF system, effecting service on all interested parties.

/s/ Joseph R. Saveri  
Joseph R. Saveri